



U.S. Department of Justice

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Southern District of New York*

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February 23, 2022

By ECF

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *D.J.C.V., et al. v. United States of America*, No. 20-cv-5747 (PAE)

Dear Judge Engelmayer:

The parties provide the below update regarding the above-captioned case. On January 25, 2022, the Court granted the parties' application to continue the stay in this matter pending settlement discussions through February 23, 2022, and ordered that the parties provide an update by that same date. *See* Dkt. No. 104.

As the parties informed the Court in their prior status letters, the United States and a group of counsel coordinating negotiations on behalf of plaintiffs and claimants ("Coordinating Counsel") were attempting to reach a nationwide resolution of actions arising from family separations at the United States/Mexico border that occurred during the prior administration. Those settlement talks have since ceased without a global resolution being reached.

The parties have discussed specific settlement proposals, and Defendant has since informed Plaintiffs that it does not believe that settlement of this matter at this time is feasible.

The parties respectfully request two weeks to submit a discovery plan to the Court in order to allow Defendant time to confer with its clients, and, then, confer with Plaintiffs.

Accordingly, the parties respectfully request that the stay in this matter be continued to March 9, 2022, and that the parties provide the Court with a proposed discovery plan by that same date.

We thank the Court for its consideration of this matter

Page 2 of 2

Respectfully,

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The Court thanks the parties for this update. The parties are to submit a discovery plan by March 9, 2022, in line with the Court's prior orders, *see* Dkt. 88. SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
2/24/22